

IN THE UNITED STATES COURT
EASTERN DISTRICT OF PENNSYLVANIA

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|----------------|---|----------------|
| Amro Elansari | : | |
| Plaintiff | : | |
| Vs. | : | No: 19-CV-3005 |
| PASSHE, et. al | : | |
| Defendants | : | |

AMENDED COMPLAINT AT LAW AND IN EQUITY

AND NOW, comes the above referenced Plaintiff, *pro-se*, to file the instant amended complaint and in support thereof avers the following:

1. Plaintiff is holder of a pending patent through the U.S. Patent and Trademark Office filed in January 2019 and paid for in March 2019.

2. Plaintiff is claiming the invention and creation of both (1) a specific process and (2) an accompanying system / software used to further this process. **Exh. b. + A**

3. Plaintiff informed the legal representatives of the Pennsylvania State System for Higher Education (PASSHE), Michael Ferguson, Esq., who referred assistant legal representative for PASSHE, Jill Fluke, Esq., to the matter, of a significant fraud and undermining of integrity taking place at the university due to the development of cyber technology over the previous decade unlike any that has taken place in the history of education in the United States before as well as the specific process that can be implemented to virtually put a stop to this fraud - statistically taking place at a rate of about 10% of students per university.

4. The legal representative for PASSHE, in a written email, informed the Plaintiff that (1) thank you for your notification to us of the idea - (2) we do not have to provide you credit to move forward or use your idea and system - thank you. **Exhibit B**

5. This is a violation of patent and intellectual property principles of law as to be described in this complaint and for this the Plaintiff is seeking relief in this court against the Defendants.

PARTIES

6. Amro Elansari is a Pennsylvania resident and the founder / creator / inventor of the application and process of “Document Inspection” and DocumentInspector.com (patent pending)

7. PASSHE is the Pennsylvania State System for Higher Education that is responsible for the administration of 14 universities in Pennsylvania and proudly represents on its website that it has graduated nearly 500,000 students and intends to continue through its degrees and programs offered in the time to come.

8. Attorney Michael Ferguson, Legal Counsel to PASSHE is a party to this case for appointing Attorney Jill Fluke to the matter when Plaintiff initially made contact with PASSHE to report this matter and fraud that has been taking place within the university system.

9. Attorney Jill Fluke, Legal Counsel to PASSHE that informed the Plaintiff in writing through email that they were thankful for the Plaintiff informing them of the fraud taking place and that they were going to proceed with the Plaintiff’s idea and process (patent pending) without providing them with credit or consideration for the idea and process.

JURISDICTION AND VENUE

10. This is an action for patent infringement, over which this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§1331 and 1338(a).

11. Venue is proper because the Plaintiff is a resident in the Eastern District and the Eastern District is where communications with the Defendants and their agents began in Summer of 2018 and PASSHE also operates offices in Philadelphia which makes the venue appropriate.

FACTUAL BACKGROUND

12. Plaintiff was made aware of a vulnerability that existed in the university system due to the rapid widespread proliferation and use of internet and cyber technologies including those that allow students to purchase writing and papers to be written for them so they can put their names on it and submit it as their own writing to then obtain a degree from the university and practice in whatever profession they choose - psychology - nursing - national security - etc.

13. Defendants use a service called TURNITIN . com which checks to see if people “copy and pasted” the writing from GOOGLE or somewhere else on the INTERNET.

14. But no idiot - in their right mind - would copy and paste something from the internet and hand it in for a school assignment because they know they will be caught easily.

15. NONETHELESS - the Universities continue to pay about \$20,000 per university to use these types of systems and processes such as TURNITIN . com to stop students from doing this.

16. Students are not “copy and pasting” from GOOGLE or the INTERNET anymore -

17. Instead - they are going to places like - WRITE MY PAPER . com (for example) (more concrete examples are presented in the detailed business plan / video demonstration)

18. And they are purchasing custom written documents by people from places like INDIA - some arrangement such as 8 pages for \$80 and the paper is written originally with sources.

19. Students simply place their names at the top of this writing and hand it in as their own, often times receiving remarks such as “Wonderful Work! A+” - and left to graduate with degrees.

20. This represents a new and evolving danger in the area of FRAUD that not only takes away from the integrity and value of institutions - but also places our public at risk of FRAUD professionals operating when they actually know little to nothing about their professions.

21. Thinking about the issue, the Plaintiff invested their own time and resources into the creation and development of an online system that can be used to check to see if someone wrote a document and then had someone else add on to it later on - this invention later led to the first ever - online - web based - easy to use - drag and drop - document inspection process website - created and copyrighted MARCH 2018 - at DocumentInspector.com - available now. The system works by dragging a submitted document - PERSON 1 PAPER - and running it through the system. The system will tell you - PERSON 1 CREATED DOCUMENT 8PM - SUBMITTED 12 PM - NO EDITS IN BETWEEN. - This will be different than - PERSON 1 CREATED DOCUMENT FROM COMPUTER 123 IN INDIA - RAJEESH - PERSON 2 EDITED IT - KATIE JENNINGS - AT 12 PM FROM COMPUTER 456 AND DOCUMENT SUBMITTED. This shows that the person submitting the document is not the one that wrote the document.

22. But the patent pending process is more than just the software - it is the actual application of the document inspection process to the university context - where just as teachers collect 24 papers from students each semester and run them through turn it in or whatever software they use - they run the writing through the document inspection process (checking to see that the person submitting the writing is the person that actually wrote it) - the process - more than just the software. This is an important distinguishing characteristic and claim in the area of patents and intellectual property.

23. Important to note as well is (1) the misrepresentation that is taking place (2) knowingly and intentionally, as well as (3) the federal funding that is involved on the basis that the person is receiving passing marks continuously. On the part of the student - to a federally funded institution such as any school in the United States - aka defrauding the federal government.

24. In Summer of 2018 - between JUNE 2018 and JULY 2018 - Plaintiff made contacts with the Defendants and informed them (1) about the FRAUD that has been taking place and (2) the proper systematic steps to take to prevent this from taking place - not just the web based application DocumentInspector.com that could be used - but also just checking to make sure that students are not submitting writing that is not their own - a process that is not currently in use by the University - and is STILL not in use by the university - which SHOWS its lack of presence which supports is novelty as the first of its kind - the manual application of system and process of document inspection - outside of the actual software used DocumentInspector.com (although it is included for ease-of-use characteristics as well).

25. All in all - this handmade manual created system of Document Inspection is a new and novel solution to a complex problem done manually to be quickly implemented in response to a critical development in online use which has included the widespread defrauding of schools resulting in federal funding loss as well as loss of integrity and credibility in American institutions.

26. Defendants, in writing, through their legal representative Jill Fluke, informed the Plaintiff that they were aware of the fraud taking place, thanked him for the idea, and informed them that they would be moving forward and did not have to credit the Plaintiff for coming to them with this idea for system and application and process.

27. To make matters worse, the Defendants have went an entire year between 2018 and 2019, continuing to allow this fraud to take place, without Document Inspecting, either because they cannot or do not know how or do not care or know it - resulting in FRAUD degrees continuing to pump out semester by semester.

28. The Defendants informed the Plaintiff that they would be moving forward without crediting them for their application and process (patent pending) - an infringement of the patent rights of the Plaintiff.

29. The Defendants actions and lack of actions have resulted in an entire year + of additional fraud that has taken place within federally funded institutions - which could have been prevented if they simply sent an email to each of their professors telling them to drag and drop papers through document inspector to make sure students are not paying others to write for them - a very simple and manual and comprehensive solution to a complex \$1 billion+ industry developing based on defrauding the United States.

30. The Defendants, for whatever reason, saw it better to insult and disrespect the Plaintiff rather than accept their assistance and work together to prevent this FRAUD from continuing to take place, thereby knowingly allowing fraud to continually take place for an entire year when they were made aware of it, resulting in a certain amount of additional federal funding dollars wrongfully taken from the federal government under fraudulent pretenses.

31. The PASSHE system and institution has an interest in pumping as many students through their system, fraudulently or not, because it makes their school look better and they continue receiving federal funding which keeps all of their paychecks coming. As a result, a complete lack of interest in preventing this FRAUD from continuing to take place has been demonstrated on the part of their Defendants, in complete disregard to the ethics associated with the practice and professions and professionals.

32. Plaintiff is seeking relief in this court for Patent Infringement and also in equity to prevent the public health crisis developing of fraudulent degrees being pumped out by fraudulent

officials at fraudulent universities in complete and reckless disregard for law, ethics, and the safety of the public and is entitled to do so under the general principles of law.

CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF

INFRINGEMENT OF THE DOCUMENT INSPECTION

APPLICATION AND PROCESS PENDING PATENT

33. Plaintiff incorporates by reference the allegations of the preceding parties of its Complaint.

34. The Document Inspector patent is currently filed and pending with the USPTO - the provisional patent of which was formally filed in January 2019 - paid for March 2019 - less than one year after the creation of the new invention in March 2018 - as per the guidelines of patent filing requirements (you have to file within one year of the creation / claim).

35. Defendants informed the Plaintiff - when he preliminarily availed the idea to them in the interest of applying it as fast as possible to prevent the ongoing fraud that was taking place - that they were thankful for the idea but that they were going to move forward without crediting them for the process.

36. The process is original and unique - unlike any other on the market or on the web - was in 2018 and still is - because it is the application process and not only the software - which in and of itself is unique because it is the first web based drag and drop easy to use mechanic of its kind on the web - but the application of this to the university context is the real invention - something that is not taking place currently - as evidenced by the tons of processors saying "oh nice work SALLY" when the paper is complete fraud and written by JAGEESH in INDIA (example).

37. More than directly informing the Plaintiff that they are appreciative of their idea and process and were going to move forward without crediting them for it - in a patent case - there really could not be more evidence - and this is in writing in an email.

SECOND CLAIM FOR RELIEF

FRAUD

38. Plaintiff incorporates by reference the allegations of the preceding paragraphs in their Complaint and further avers the following.

39. The Defendants have an interest in continuing to put out fraudulent degrees because it results in additional federal funding.

40. Despite being informed and aware of this FRAUD, Defendants have continued to allow the FRAUD to take place until now resulting in an entire year of additional fraudulent degrees being put out and federal funding allocated to support this fraud as it continues to take place resulting in many FRAUD degrees being given to FRAUD people who are left to practice and work in society without actually knowing about their professions which creates a substantial risk to public health and safety in a variety of context.

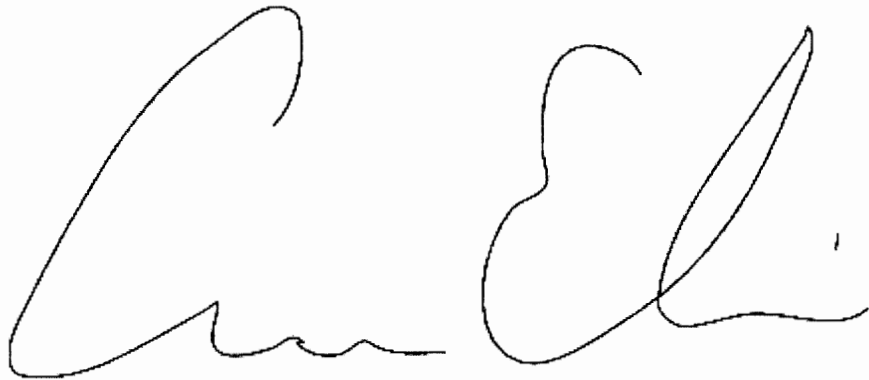
CONCLUSION

41. Integrity is one of the main elements that separates the United States from other institutions around the world - it makes little sense to continue to allow this fraud from taking place in our public institutions - and anyone that really cared about and respected education would be eager to put a stop to this multibillion dollar fraud industry developing right before our eyes - but people are too preoccupied with themselves to care - resulting in this case.

42. Plaintiff is asking the court for recognition of the patent infringement as well as penalties to be administered for the Defendants benefit from an entire year of continuing to deprive the federal government of funding through statistically 10 percent of their students submitting fraudulent papers each semester despite being clearly informed and made aware about the matter and their patent pending application and process to prevent this in JUNE / JULY 2019 as well as any other damages / remedies that they may be entitled to at law and in equity.

WHEREFORE, it is hereby respectfully requested that this Honorable Court allow the instant complaint to move forward to pretrial and trial proceedings to justice can be administered in this matter of FRAUD involving federal funding.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Amro Elansari', with a stylized, cursive script.

Dated: August 15, 2019

Amro Elansari
Liberty And Justice For All